

Gift Policy

HR Policy No: E – 5.6

1. OBJECTIVE

In order to maintain good relations with our business partners while we adhere to the ethical standards and norms of TCL in letter and spirit, the key guidelines that govern the acceptance and giving of Gifts by TCL employees are documented in this policy.

2. SCOPE

This policy is applicable to all employees of TCL and covers

- a) Gifts or other considerations received by an employee
- b) Gifts or other considerations given by an employee

3. PROCESS

3.1.1 In the conduct of business, gifts shall neither be solicited nor offered under any circumstances.

3.1.2 In many circumstances, receipt and giving of gifts is a part of normal social exchange. However the cardinal principle would be that gifts shall not be received or given either to obtain any favours /preferential treatment or in return for favours /preferential treatment.

3.1.3 The typical circumstances under which gifts /considerations are normally received or given have been highlighted in the Annexure 1 of this policy. The Annexure also incorporates guidelines for acceptance /giving gifts under each of these circumstances. The guidelines mentioned therein are generic in nature and employees are encouraged to seek clarifications from the Principal Ethics Counselor in specific cases which is not described in the annexure or where they feel the need for further clarification.

3.1.4 Permissible gifts would constitute some articles given out of customary practice and in the spirit of goodwill/relationship. For example eatables, sweets, inexpensive mementoes etc

3.1.5 Following are strictly non-permissible gifts:

- Money in any form (cash, cheque, DD, promissory notes, pre-loaded cards,etc)
- Valuables (precious metals, gems or antiques)
- Vouchers for exchange (either goods or services)

3.1.6 It is recognized that at times gifts exceeding the value caps mentioned in this policy may be received. The employee in such cases, shall return the gift to the giver thanking him/her for the same, with a letter clearly stating TCL policy on gifts. In situations where returning the gift would cause embarrassment, the employee shall receive the gift, deposit the same with the Treasury department under due intimation to the Principal Ethics Counsellor and his / her Reporting manager. The Principal Ethics Counsellor shall then decide on appropriate disposal /usage of such gifts/articles so received.

3.1.7 In case of any clarification /interpretation of this policy the employees shall contact the Principal Ethics Counselor.

5. ROLES & RESPONSIBILITIES

Employees	<ul style="list-style-type: none">• Educate suppliers/vendors/consultants/partners on TCL Gift Policy• Do not accept gifts of high value• Deposit high value gifts with TCL treasury• Adhere to value limits when giving gifts to others.• Seek clarification when in doubt• Inform PEC if they come across a violation
Reporting /Reviewing managers	<ul style="list-style-type: none">• Guide and counsel team members about the Gift policy
Location Treasury	<ul style="list-style-type: none">• Receive high value gifts deposited by employees• Dispose/Utilize the same based on guidelines from Principal Ethics Counselor• Keep records
Principal Ethics Counselor	<ul style="list-style-type: none">• Overall process & policy ownership• Guide and counsel employees• Guide Treasury on usage /disposal of expensive gifts.• Initiate appropriate corrective actions in cases where violation is proved.

6. EXCEPTIONS

Any exceptions to this policy will require the approval of the CHRO or Official nominated by him/her.

7. DEFINITIONS

PEC – Principal Ethics Counselor

8. REFERENCES

Tata Code of Conduct

Annexure-1

Typical Situation/Circumstances	Guidelines for Receipt of Gifts	Guideline for Giving Gifts
Gifts received on New Year /Deepavali/Christmas or other festive occasions	<ul style="list-style-type: none"> • Articles of edible nature can be shared with other employees in the office . • Articles of office use like clocks, stationeries, desk accessories of value not exceeding Rs 1000/ may be accepted and used. • Any gift exceeding Rs 1000/- as estimated by the receiver, shall not be accepted and shall be returned politely by drawing reference to TCL's Gift policy. 	As a policy TCL employees shall not give any gifts/consideration to our business partners.
Gifts received from dealers/suppliers/vendors, business partners on occasions of wedding of Self or children	<ul style="list-style-type: none"> • Gifts worth Rs 1000/- as estimated by the receiver may be accepted. • Any gift/item exceeding Rs 1000/- as estimated by the receiver, shall not be accepted and shall be returned politely but firmly stating TCLs policy on Gifts. 	<p>Any gift to be given irrespective of value must be made only after taking prior approval of the SBU Head/Functional Head/ PEC or MD.</p> <p>No gift in Cash or items made of precious metals like Silver/Gold shall be given.</p>
Gift Vouchers/Cheques /Honorarium received in recognition of outstanding professional contribution/delivering address/lecture as an subject matter expert	<ul style="list-style-type: none"> • Gift Cheques/Honorarium payments in recognition of participation as speaker in professional forums may be accepted only if the value of the same is less than Rs 2500/- and not more than 4 times in a fiscal year. Any Tax liability arising out of the same is to be dealt with by the recipient. • Any gift / item where the value is estimated to be exceeding Rs 1000/- as estimated by the receiver, shall not be accepted and shall be returned politely but firmly stating TCLs policy. • Where travel, lodging and boarding arrangements are provided by the organizers it shall be restricted to moderate levels. 	Token items like books/souvenirs/ Okhai items may be given with prior approval of SBU Head/Functional Head /PEC.
Special Conferences/ Meetings/Pleasure trips or get-togethers organized domestically or abroad	<ul style="list-style-type: none"> • Should be discouraged politely but firmly. • If attendance is a must, the concerned employee shall take prior approval of the SBU Head / Function Head and the PEC / MD for the same. 	Any similar event being done by TCL only with the prior approval of the SBU Head / Function Head and Principal Ethics Counsellor and MD.
Where gifts etc cannot be returned for any reason whatsoever.	If the value of gift received is in excess of Rs 1000/- the employee shall deposit the gift with the Treasury Department under intimation to the Principal Ethics Counsellor and Reporting Manager.	
Celebrating a Project Milestone/Completion of a major project/Achievement of prestigious award /special target	Inexpensive gifts /mementoes without or with lunch/dinner in a hotel/club appropriate to the occasion, with the prior approval of the SBU Head / MD.	Inexpensive gifts /mementoes without or with lunch/dinner in a hotel/club appropriate to the occasion, with the prior approval of the SBU Head / MD. No gift in cash /kind shall be accepted.